

Exhibit 58

From: [Priselac, Jessica](#)
To: [Christopher Geddis](#)
Cc: [Adam Slater](#); [Goldberg, Seth A.](#); [Good, Rachel](#)
Subject: RE: Valsartan MDL
Date: Tuesday, February 8, 2022 4:56:14 PM

Chris-

My apologies, please see my email below with a highlighted correction.

From: Priselac, Jessica
Sent: Tuesday, February 8, 2022 4:54 PM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Good, Rachel <RMGood@duanemorris.com>
Subject: RE: Valsartan MDL

Chris,

As a follow up to Seth's email, I've broken down the categories as they are set forth in SMO 54:

- The custodial file of Xiaofang ("Maggie") Kong
 - Ms. Kong's custodial file was produced on 2/2 as part of ZHP051. While the production is complete, we are in the process of preparing a privilege log to accompany this production. As part of that process, if any documents are deemed non-privileged, or can be produced in a redacted form, we will produce them to Plaintiffs.
- The document bearing bates number ZHP02710347, et seq., in its native format with metadata, and all non-privileged documents bearing the designation, "TC-201729"
 - We previously undertook a search for these documents last year, and are searching once again based on SMO 54. As both our client and vendor have just returned from the Chinese New Year holiday, we hope to be able to provide you with a timeframe for production (if any additional **non-privileged** documents are found) later this week.
- The remaining nitrosamine testing results (i.e., non-USMDF testing results) referenced in PRINSTON0075797
 - As we've previously informed Plaintiffs, these documents are only kept in hard copy, and given the large number of results requested, it will take several weeks to scan them. As with the second category of documents, we hope to be able to provide you with a timeframe for production later this week.

Best regards,

Jessica

Jessica Priselac

Attorney at Law

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1159
F: +1 215 827 5486
C: +1 650 224 9097

JPriselac@duanemorris.com
www.duanemorris.com

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Monday, February 7, 2022 9:00 AM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>
Subject: RE: Valsartan MDL

Chris,

The dates are confirmed. Jessica will follow up regarding the document production.

Best,
Seth



From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, February 4, 2022 4:01 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>
Subject: RE: Valsartan MDL

Hi Seth,

Plaintiffs would like to confirm with you and then Judge Vanaskie that pursuant to your January 20, 2022 email, Plaintiffs have a total of sixteen days (seven plus the nine additional days ZHP also received) to file their reply to ZHP's opposition, making it due on February 18, 2022. Once we confirm this with you, we will email Judge

Vanaskie to confirm the same date.

Additionally, ZHP's opposition brief states that it has started to produce the documents subject to the sanctions motion, which it identifies as "(1) the custodial file of Mr. Chen's chief of staff, Xiaofang ("Maggie") Kong; (2) an internal ZHP report discussed in the July 27, 2017 email sent by Jinsheng Lin, with bates numbering beginning at ZHP02710347; (3) all non-privileged documents bearing the designation 'TC-201729'; and (4) responsive and non-privileged documents relating to the batch testing for nitrosamines referenced in PRINSTON0075797." (Opp. Br. 3 n.1). Please provide the production and bates numbers for the documents responsive to these respective four categories as soon as possible so that Plaintiffs can assess ZHP's claim that this part of the motion is now "moot." Please also confirm if ZHP has completed its production of any of these four categories. If ZHP has not completed its production of a category, please confirm when ZHP will complete its production of those documents.

Thanks,
Chris

Christopher J. Geddis
Associate Attorney
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 228-9898
cgeddis@mazieslater.com
www.mazieslater.com



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From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Thursday, January 20, 2022 5:32 PM
To: Vanaskie, Thomas I. <thomas.vanaskie@stevenslee.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

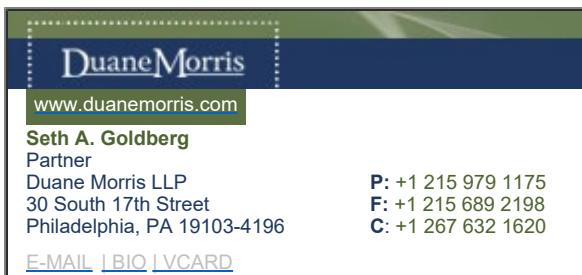
Subject: Valsartan MDL

Dear Judge Vanaskie:

I write on behalf of the ZHP Parties to inform Your Honor that the parties have agreed to modest extensions of the deadlines for two briefs. The ZHP Parties' opposition to Plaintiffs' motion for sanctions with respect to the deposition of Mr. Chen and the production of certain documents is currently due on Monday, January 24. The parties have agreed to extend this deadline to Wednesday, February 2. The ZHP Parties' response to Plaintiffs' request for monetary sanctions with respect to the deposition-related sanctions the Court previously granted is currently due on February 1. The parties have agreed to extend this deadline to Wednesday, February 9. The parties have also agreed that the deadlines for Plaintiffs on reply briefs, if any, would be similarly extended.

We do not believe an order regarding these extensions is necessary, but would be happy to provide Your Honor with an Order if that is your preference.

Respectfully,
Seth Goldberg



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